

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA

ASSATA ACEY,	:	CIVIL ACTION
:		
<i>Plaintiff</i>		
:		
v.	:	
:		
INDUCTEV,	:	
:		
<i>Defendant.</i>		No. 2:23-01438-PD
:		

Reply

To the plaintiff's knowledge, Fed. R Civ. P. 56 does not conflate a separate *statement* of facts with a separate *document* for said statement. Nor are reference excerpts of exhibits viewed as a hindrance to concision---these were included for increased efficiency and clarity when using the Appendix.

However, Plaintiff is willing to accommodate the needs of the Defendant-if the court deems appropriate-- so that they can identify plaintiff's statement of facts.

Background

Whereas:

- The Defendant has expressed that they require more than the labelled, antecedent conclusion section to distinguish plaintiff's proposed facts from the section labelled "Proposed Facts and Conclusions of Law".
- The Defendant has expressed the labelling by applicable test/topic has

prevented them from identifying proposed facts.

- The Defendant has argued that the reference excerpts have also prevented them from identifying and responding to the Plaintiff's proposed facts.

Plaintiff provides a copy of her Doc 92, with *preceding* legal theory, *anteceding* conclusions, and all excerpts topic/test labels *whited out*.

Motion

If it pleases the court (and Plaintiff's prior motion, Doc 146, does not), Plaintiff asks that the Defendant be granted leave to use this attachment to file an amended response to Plaintiff's proposed facts.

Sincerely,

Assata Acey Hackman /s/

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